

FRIEDMAN & ANSPACH

Attorneys at Law
1500 Broadway
New York, New York 10036
(212) 354-4500

EUGENE S. FRIEDMAN
WILLIAM ANSPACH
ANUSHA RASALINGAM
JAE W. CHUN

AMANDA BELL
ERIN McGEE
DANIEL TREIMAN

FAX: (212) 719-9072
www.friedmananspach.com

April 8, 2020

VIA ECF

The Honorable Mary Kay Vyskocil, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street, Room 2230
New York, NY 10007

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: 4/8/2020

Re: Demopoulos et al v.
Winters Trucking Corp. et al
1:19-cv-11748-MKV

Dear Judge Vyskocil:

I represent the Plaintiffs, the Trustees and Fiduciaries of the Local 584 Pension Trust Fund, in the above-captioned matter. In your March 24, 2020 Order (Doc. # 16), you had directed the Plaintiffs to file a motion for entry of default judgment by April 17, 2020, with any opposition due by April 24, 2020. I am writing to request an extension of time on these deadlines.

Counsel for the Defendants has contacted us, and we have arrived at a settlement in principle. In order to have sufficient time to finalize this settlement and to obtain the necessary signatures from our respective clients — tasks that are made more challenging by the current pandemic — we request an extension of two weeks on the two deadlines set by the Court, pushing them back to May 1, 2020 as a deadline for Plaintiffs to file any default motion and May 8, 2020 as a deadline for any opposition.

We anticipate that before the first of those proposed new deadlines, we will have finalized our settlement agreement and will be able to make a motion to dismiss with the consent of both parties.

Defendants' counsel, Eric Simon of Jackson Lewis — to whom I gave a copy of your March 24, 2020 Order — has consented to this request. This is the only request for an extension that has been made in this case.

April 8, 2020
Page 2

Thank you for your consideration.

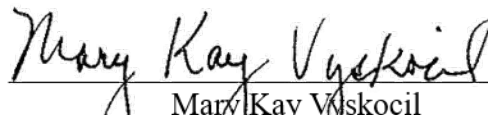
Respectfully submitted,

/s/
Daniel Treiman

Cc: Eric Simon, Jackson Lewis, Counsel for Defendants, via email to
Eric.Simon@jacksonlewis.com

Granted. SO ORDERED.

Date: 4/8/2020
New York, New York


Mary Kay Vyskocil
United States District Judge